IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA LYNCHBURG DIVISION

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Plaintiff,

v.

Case No. 6:22-00028-NKM

ENVIGO RMS, LLC,

Defendant.

NOTICE OF SUBMISSION OF THE PARTIES' JOINT TRANSFER PLAN

In compliance with the Court's June 30, 2022 order, ECF No. 34, the United States and Envigo RMS, LLC ("the Parties") hereby submit the Parties' joint transfer plan to transfer all beagles remaining at the Cumberland Facility. Ex. A (Joint Transfer Plan). Furthermore, the Parties have reached an agreement in principle to resolve this case in its entirety. Accordingly, the United States respectfully requests a 10 day extension on this Court's directive to "schedule a hearing on whether the plan presented by the Government should be incorporated into the Injunction against Envigo," ECF No. 34 at 3, to secure the necessary approvals to finalize the settlement.

DATED: July 1, 2022

Respectfully Submitted,

CHRISTOPHER R. KAVANAUGH

United States Attorney

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